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**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH, CENTRAL DIVISION**

<b>UNITED STATES OF AMERICA,</b>  Plaintiff,  vs.  <b>AARON MICHAEL SHAMO,</b>  Defendant.	Case No. 2:16-cr-00631-DAK  <b>MOTION FOR RESTITUTION AND JOINT REQUEST FOR A RESTITUTION HEARING POST SENTENCING</b>  Judge Dale A. Kimball
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The United States moves the Court to enter the restitution amounts, below, as part of its Judgment. The defendant owes the following amounts as restitution to the following victims and/or victims' representatives:

Amount	Victim/Representative	Purpose
\$24,625.00	T. K.	Funeral and related expenses for G.K., lost income
\$29,698.57	L.V.	Educational costs borne by parents due to death of C.V. (alt: lost income of C.V.)
12,724.32	J. L.	Damages at Titian Way house not covered by insurance
\$47,226.08	United Insurance Group	Insured damages at Titian Way house
\$18, 193.00	R. R.	Damage personal property at Titian Way house
<b>TOTAL: \$132,466.97</b>		

Because the defendant contests these restitution amounts, the parties jointly request that the Court set a hearing within ninety days<sup>1</sup> from the defendant's sentencing hearing for the United States to proffer documentation in support of the restitution amounts and provide argument that the restitution should be ordered.

Respectfully submitted this 12th day of October, 2020.

JOHN W. HUBER  
United States Attorney

/s/ Michael Gadd  
MICHAEL GADD  
Special Assistant United States Attorney

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<sup>1</sup> 18 U.S.C. 3664(d)(5) states, in pertinent part: "If the victim's losses are not ascertainable by the date that is 10 days prior to sentencing, . . . the court shall set a date for the final determination of the victim's losses, not to exceed 90 days after sentencing." Because the restitution amounts are in dispute, the United States will attempt to gather additional documentation in support of the requests of the victims.